

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

DRAFT

Conditional Major, Construction / Operating

Permit: F-07-020

Benson International, Inc.

Cadiz, KY 42211

Date March 15, 2007

Sajjad Quabili, Reviewer

SOURCE ID: 21-221-00014

SOURCE A.I. #: 74766

ACTIVITY ID: APE20060001

**SOURCE DESCRIPTION:**

Benson operates an aluminum trailer manufacturing facility in Trigg County, Kentucky. The source applied to the Division to construct a steel truck trailer plant. The process includes assembly of metal pieces, welding, grinding, grit blasting and painting. Currently, Benson is a registered source.

**COMMENTS:**

The Division found that Benson is potentially a major source for VOC emissions. Benson accepted voluntarily a cap on VOC emissions to become a conditional major source. The source wide allowable VOC emission limit is no greater than 60 tons per year. No control equipment is utilized for VOC emissions. Exhaust filters are utilized to control particulate matter.

**Emission Point 04:**

Small steel parts for the aluminum trailers are painted with "Direct to Metal Black Paint". No primer is necessary for this type of paint. About 95 % of the trailers will have black finish and the remaining 5% of the trailers will have custom requested special color. This booth consists of two applicators with a capacity of 5.6 gallons per hour, each.

**Emission Point 09:**

For the coating operation, all the truck bodies are painted with primer and followed by color coat. After the prime coat is dried, most of the truck bodies (approximately 95%) will be painted black with the remaining 5% will be painted other special colors. This booth consists of two applicators with a capacity of 10 gallons per hour, each.

**Applicable regulation:**

Regulation 401 KAR 59:010, New process operations, will apply to both emission points EP 04 and EP 09 since the affected facilities commenced after July 2, 1975.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

Benson shall keep source wide emissions of VOCs no greater than 60 tons during any consecutive 12 month period.

**PERIODIC MONITORING:**

Benson will keep records of all primers, top coats, thinners, and clean-up solutions used, including the type, amount, VOC content by weight percent, less any water and/or exempt solvent. The permittee will also calculate 12-month rolling total for VOC emissions every month.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.